

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF NEW YORK**

In re:

ABSOLUT FACILITIES MANAGEMENT, LLC,
ET AL.,

Debtors.

Chapter 11

Case No. 19-76260-ast

(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that John R. Stoelker of McCarter & English, LLP, hereby enters his appearance in the above-captioned case for Grandison Management, Inc. (“Grandison”), and hereby requests, pursuant to Section 1109 of Title 11 of the United States Code and Rules 2002, 3017, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure, that Grandison be placed on the mailing matrix filed by the debtor(s) and any and all other mailing matrices or service lists that may be used for any purpose in this case and that copies of any and all notices given or required to be given and of all pleadings and other papers served or required to be served in this case be given and served on undersigned counsel at the following address:

John R. Stoelker
McCarter & English LLP
100 Mulberry Street
Four Gateway Center
Newark, New Jersey 07102
Tel: 973-622-4444
Fax: 973-206-6668
Email: jstoelker@mccarter.com

PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether written or oral, formal or informal, and whether

transmitted or conveyed by mail, hand delivery, facsimile transmission, telephone, telegraph, telex or otherwise, which affects the debtor(s) or the property of or in the possession, custody or control of the debtor(s), or which is otherwise filed or given with regard to the above-captioned case.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any subsequent appearance, pleading, claim or suit is intended to waive Grandison's (i) right to have final orders in non-core matters entered only after *de novo* review by a United States District Court Judge; (ii) right to a jury trial in any proceeding so triable herein, or in any case, controversy or proceeding related hereto; (iii) right to have the reference withdrawn by a United States District Court Judge in any matter subject to mandatory or discretionary withdrawal, including proceedings over which the Bankruptcy Court lacks constitutional authority to enter final judgments; or (iv) other rights, claims, defenses, setoffs or recoupments to which Grandison is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved.

Dated: Newark, New Jersey
October 23, 2019

McCARTER & ENGLISH LLP

By: s/ John R. Stoelker

John R. Stoelker
100 Mulberry Street
Four Gateway Center
Newark, New Jersey 07102
Tel: 973-622-4444
Fax: 973-206-6668
Attorneys for Grandison Management, Inc.